

Douglas J. Dixon, State Bar No. 275389
ddixon@hueston.com
Joseph A. Reiter, State Bar No. 294976
jreiter@hueston.com
William Larsen, State Bar No. 314091
wlarsen@hueston.com
HUESTON HENNIGAN LLP
620 Newport Center Drive, Suite 1300
Newport Beach, CA 92660
Telephone: (949) 229-8640
Facsimile: (888) 775-0898

John Calandra (*pro hac vice*)
jcalandra@mwe.com
Nicole Castle (*pro hac vice*)
ncastle@mwe.com
Michael R. Huttenlocher (*pro hac vice*)
mhuttenlocher@mwe.com
MCDERMOTT WILL & EMERY LLP
One Vanderbilt Avenue
New York, New York 10017
Telephone: (212) 547-5400
Facsimile: (212) 547-5444

Attorneys for Defendant Basecamp, LLC

Attorneys for Movant Apple Inc.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

Apple Inc.,
Movant,
vs.
Basecamp, LLC,
Defendant.

Case No. 3:21-mc-80187-YGR (TSH)

**STIPULATION AND [PROPOSED] ORDER
REGARDING WITHDRAWAL OF APPLE
INC.'S MOTION TO COMPEL**

Pursuant to Civil Local Rule 7-12, Movant Apple Inc. and Defendant Basecamp, LLC, by and through their respective counsel, hereby agree as follows:

WHEREAS, in light of the Settlement Agreement and related motion for preliminary approval filed in *Cameron v. Apple Inc.*, No. 4:19-mc-03074-YGR (TSH), Apple has elected to withdraw its motion to compel in this action against Basecamp;

WHEREAS, Apple reserves all rights to pursue additional documents in the future without reservation;

WHEREAS, Basecamp similarly reserves all rights to object to such pursuit, including but not limited to on grounds of relevance, privilege, and timeliness;

1 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED that Apple
2 withdraws the motion to compel pending in this action. The clerk shall enter an order of dismissal
3 in due course.

4
5 **SO STIPULATED:**

6 DATED: September 3, 2021.

HUESTON HENNIGAN LLP

8
9 /s/ Douglas J. Dixon

Douglas J. Dixon, State Bar No. 275389

Joseph A. Reiter, State Bar No. 294976

William Larsen, State Bar No. 314091

11 *Attorneys for Defendant Basecamp, LLC*

12
13
14 DATED: September 3, 2021.

MCDERMOTT WILL AND EMERY LLP

16 /s/ Nicole L. Castle

Nicole Castle (*pro hac vice*)

John Calandra (*pro hac vice*)

Michael R. Huttenlocher (*pro hac vice*)

19 *Attorneys for Movant Apple Inc.*

20 **PURSUANT TO STIPULATION, IT IS SO ORDERED:**

21 DATED: _____, 2021.

22
23
24 _____

DECLARATION REGARDING CONCURRENCE

I, Douglas J. Dixon, am the ECF user whose identification and password are being used to file this **STIPULATION AND [PROPOSED] ORDER REGARDING WITHDRAWAL OF APPLE INC.'S MOTION TO COMPEL**. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that all of the signatories listed above have concurred in this filing.

DATED: September 3, 2021.

/s/ Douglas J. Dixon